

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

TRUSTEES OF THE NATIONAL RETIREMENT  
FUND,

Plaintiffs,

-against-

INTERNATIONAL VEILING CORP. and JOHN DOES  
1-10 (all other trades or businesses under common  
control with INTERNATIONAL VEILING CORP.),

Defendants.

20-cv-01449 (KMK)(PED)

**STIPULATION TO  
ENTRY OF DEFAULT  
JUDGMENT BY CONSENT**

**WHEREAS**, plaintiffs Trustees of the National Retirement Fund (the "Fund") have commenced the above-captioned action in the United States District Court for the Southern District of New York to collect outstanding withdrawal liability, interest, liquidated damages, costs, and attorneys' fees (the "Action"); and

**WHEREAS**, defendant International Veiling Corp. ("International Veiling") has not appeared, answered, or otherwise moved with respect to the Complaint, and the time for appearing, answering or moving having expired, and the Court having issued its Order to Show Cause requiring defendant International Veiling to show cause before the Court why a Default Judgment should not be entered against Defendant International Veiling, and the Court having held a hearing pursuant to the Order to Show Cause, and Defendant International Veiling having failed to appear at the show cause hearing; and

**WHEREAS**, Gary N. Marks, Assignee for the Benefit of Creditors of International Veiling, an amicus non-party (“the Assignee”), appeared in the Action to object to the proposed Default Judgment presented to the Court by the Fund, and the Fund thereafter opposed the non-party Assignee’s objections; and

**WHEREAS**, the Assignee and the Fund hereto wish to resolve, fully and finally, the Assignee’s objections to the Fund’s application for a Default Judgment in the Action solely on the following terms and conditions.

**IT IS HEREBY STIPULATED AND AGREED** by and between the parties to the above-captioned action:

1. The above recitals are fully incorporated as substantive terms of this Stipulation to Entry of Default Judgment by Consent (“Stipulation”).
2. The Assignee hereby withdraws its objections presented in the Action and consents to entry of a Default Judgment in favor of the Fund in the form Default Judgment annexed hereto as Exhibit “A.”
3. The Assignee and the Fund represent that the representatives executing this Stipulation on behalf of each of them have full authority to do so.

4. The Assignee and the Fund shall each bear their own fees and costs incurred in the Action.

Dated: September 10, 2020  
White Plains, New York

**TRUSTEES OF THE NATIONAL  
RETIREMENT FUND, Plaintiffs**

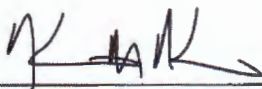
**GARY N. MARKS, ASSIGNEE FOR  
THE BENEFIT OF CREDITORS OF  
INTERNATIONAL VEILING CORP.,  
Amicus**

By:   
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By:   
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SO ORDERED:   
Honorable Kenneth M. Karas  
U.S.D.J.

9/10/20